

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
VS.)	CASE NO.: 3:22-CR-327
)	
)	
DENNIS GREEN)	JUDGE TRAUGER

MOTION TO CONTINUE SENTENCING HEARING

Comes now the Defendant, Mr. Dennis Green, and moves this Honorable Court to continue the sentencing hearing in this matter currently set for July 2nd, 2024, at 3:00 P.M. For cause, Mr. Green would inform the Court that he has recently been diagnosed with complex sleep apnea syndrome which effects his ability to breath effectively overnight. Mr. Green also suffers from a serious heart condition that led to his hospitalization in 2021 and this coupled with serious sleep apnea without a firm diagnosis and treatment plan is cause for concern. Mr. Green is currently scheduled to complete further testing relating to his sleep apnea on July 29th, 2024, with an overnight study and the results of that study will allow his doctors to formulate a course of treatment for him going forward.

Additionally, Mr. Green and his counsel were provided the presentence report late last week and are just now beginning to review it and strategize about sentencing issues and approaches that would be most effective. Though not untimely, the PSR being supplied approximately three weeks prior to the sentencing hearing creates an expedited schedule for preparing for the hearing and all required documents for the sentencing. Additional time would be advantageous to prepare for sentencing.

For these reasons Mr. Green prays the Court will find merit with his request and continue the sentencing hearing in this matter to date no earlier than mid-August so that he can further prepare for the hearing with his counsel and complete the medical testing relating to his recently diagnosed disorder.

Respectfully Submitted,

/s/ Manuel B. Russ
Manuel B. Russ #23866
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CERTIFICATE OF SERVICE

I do hereby certify that on this the 11th day of June, 2024, a true and exact copy of the foregoing Notice has been delivered, via the Court's electronic filing system to Ms. Nani Gilkerson of the United States Attorney's Office, US Courthouse, 719 Church Street, Suite 3300, Nashville, TN 37203.

/s Manuel B. Russ
MANUEL B. RUSS